

# **Exhibit 14**

**Exhibit 14 - transcript - Audio statement - Phil Berg on The Right Perspective - October 17, 2008**

**The Right Perspective's Host 1:** Tonight's guest first appeared on our show back in August to talk about his lawsuit against The Federal Elections Commission, The DNC and the Democratic Party's candidate Barack Hussein Mohammed Obama. Tonight he returns to give us the latest on what's going on with his efforts that asks the question, Is Obama a natural born citizen? So lets welcome back, please, a lawyer, Philip Berg. Welcome back to The Right Perspective, Phil.

**The Right Perspective's Host 2:** Hi Phil.

**Philip Berg:** How you doing? My pleasure being back on your show again.

**The Right Perspective's Host 2:** Thanks for joining us.

**The Right Perspective's Host 1:** A Nigerian living in Norway, that says he has an audio tape of Michelle Obama saying that Obama was adopted by his

yet. I, we're looking at it. We're right now preparing. If anyone wants to do it, they should contact us. People are contacting us that we should file suit in many states. We're planning on that early next week. Uh, so if any of your listeners want to do that, they can email us through or website and put down the state where they're in (inaudible) with doing it. Or they can doing in 5, 10, 15 states, even up to 50 states. To the secretary of state in each state stating you must go ahead and mark the ballot because he doesn't meet the qualifications for president. I haven't looked at the one in Washington. I will be looking at it soon.

**The Right Perspective's Host 1:** I also want to thank you for coming on The Right Perspective. Can you give us your website again?

**Philip Berg:** Obamacrimes.com. O B A M A C R I M E S .com Please visit our website, spread it to your friends, contribute some money, stay with us, monitor us. We're going to get to the bottom of this in the next two weeks.

**The Right Perspective's Host 1:** Thank you and hope you'll come back again.

father, his stepfather, Lolo, uh, Soetoro. Is that true?

**Philip Berg:** Um, He says he has it. Um, I said to, um, Mr. Corsi , um, we're pretty sure he has that tape. Um, More important in that tape if they have it, is that, supposedly, Michelle Obama is like really blasting the African people saying why aren't you supporting, wholeheartly, my husband. Ya know, ya know, the racist comments back here in the United States. She really goes off on a tangent. Um, it, it, well, it just reinforces the fact that he was adopted. But, I think the school records reinforces that he was adopted.

The fact that he was in school, which he says in his book he was there. I mean, certain things Obama had made a number of statements which sort of justifies the fact that he was in school there. And the only way he could be in school there was by being a citizen. I think we have him. Ya know, I think he knows. The sad thing is, he knows, and he's pulling , trying to pull the wool over all of our eyes. And it's a disgrace.

**The Right Perspective's Host 1:** Steve Markee or Steve Marquee who has filed his own lawsuit to get Obama's birth certificate.

**Philip Berg:** Well that's a suit up in Washington state. I, I haven't read it

**Philip Berg:** I definitely will.

**The Right Perspective's Host 2:** Thank you, Phil.

# **Exhibit 15**

Posted by African Press International on October 24, 2008

Author : MommaERadioRebels

Comment:

Dear Chief Editor Korir,

□

I was asked to verify that the Law Offices of Phillip J. Berg, Esquire has never represented Ed Hale in any way. □ When Mr. Hale called Mr. Berg, he asked if he would represent him in getting tapes from API. □ Mr Berg tried to make the call for Ed, but never talked to anyone at API, as he was told to call back, then realized that he was speaking to African Press International. □

□

When he hung up he never called back, nor did he speak to Ed Hale again, for he realized that API and African Press International was one and the same. □ Mr. Berg could not enter into an agreement with Mr. Hale, because he was already the Attorney of Representation for African Press International (API). □ □ As I am sure you all know, that when an Attorney agrees to represent you, they furnish you with a letter of Representation and/or an agreement signed by both parties.

□

The reason Mr. Berg's office asked me to verify this, is because I have been involved with this from day one. □ I know for a fact that Mr. Berg does NOT represent; has NEVER represented and will NEVER represent Mr. Hale in any shape, form or fashion, which means NO WAY, NO HOW!!

□

Respectfully,

Momma-E & The Radio Rebels

# **Exhibit 16**

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## Atty. Philip J. Berg Accuses The Post & Email of Libel and Slander; Threatens to Sue



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### DEMAND MADE FOR RETRACTION AND APOLOGY...BUT FOR WHAT?

by *Sharon Rondeau*



Is there any justice left in the United States of America?

(Jun. 25, 2011) — On Monday evening, June 20, 2011, The Post & Email received a letter through its editor@thepostemail.com address from Attorney Philip J. Berg accusing us of libel against two of his clients who have an active lawsuit against Atty. Orly Taitz in California.

Berg was the first attorney to file a lawsuit against Barack Hussein Obama claiming that he was not a "natural born Citizen" and therefore ineligible for the presidency. In his lawsuit, Berg requested the court to order Obama to release a "certified copy" of his long-form birth certificate, certification of citizenship, and oath of allegiance. Berg described himself as "a licensed attorney in good standing" who had "taken an oath to uphold the United States Constitution."

The suit was filed shortly before the Democratic National Committee held its August 2008 conference to nominate its candidates for president and vice president.

Currently, Berg's website featuring the April 27, 2011 release of what Obama claims to be his long-form birth certificate from Hawaii urges potential donors to his cause to "Become a supporter of our effort to find the truth."

In his letter to The Post & Email, Berg claimed that we had published an article defamatory to clients, one Lisa Liberi and one Lisa Ostella. He stated that "the bulk of this article contains false statements about my clients, Liberi and Ostella by Orly Taitz, who is a Defendant in a case pending against her by my clients in California. Your agency and your reporter, Sharon Rondeau, failed to conduct any type of verification to verify the truthfulness of said statements and instead disseminated the false, libelous, defamatory and slanderous statements all over the Internet, further damaging and harming my clients."

The Post & Email has cited Berg's work in regard to the question of Obama's eligibility here, here, here, here, and in many other articles. We conducted a personal interview with him last fall. Prior to that, we had made several other requests by email and phone calls which were not answered. The Post & Email bore no malice towards Mr. Berg whatsoever, nor did we ever have any quarrel with him.

The story to which Berg was objecting was published on June 13, 2011 and reported primarily on Taitz's case against the Social Security Administration for denying her access to Obama's social security number application. Taitz and at least two private investigators have declared that Obama's social security number was stolen or manufactured.

In composing the article, The Post & Email wrote several introductory paragraphs and obtained information directly from Taitz, who described the progress of the case and possible next steps by Judge Royce Lamberth. She diverted to expound on the Liberi lawsuit reported before that time on her website which Berg had filed against her. Taitz alleged that Berg was guilty of prior misconduct, referencing a lawsuit filed and won against Berg in 2005 for acting negligently on behalf of his clients. The court had sanctioned Berg under Rule 11 "in order to preserve the integrity of this Court and the legal profession" (page 2).

In *Holsworth v. Berg*, Berg's Third-Party Complaint was dismissed due to his failure to respond within the required time frame. The court stated that "Mr. Berg filed a complaint completely devoid of any basis in fact or law, that such inadequacy would be apparent to any reasonable attorney after the slightest inquiry, and that Mr. Berg's improper filing qualified as an exceptional circumstance warranting Rule 11 sanctions" (page 5).

A footnote at the bottom of page 5 of the "Memorandum and Order" dated July 26, 2005 by Judge "J. Joyner" states:

Sanctions imposed on Mr. Berg include:

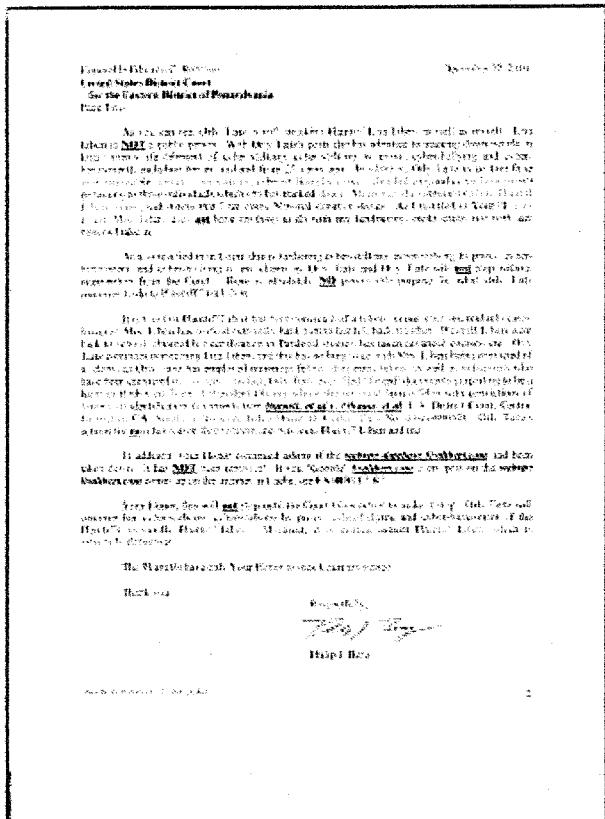
- (1) Damages of \$10,668.78 for attorney's fees and costs incurred by Carpenters Health through May 9, 2005;
- (2) Mr. Berg must complete six (6) credits of ethics courses certified by the Pennsylvania Board of Continuing Legal Education;
- (3) Further investigation of this matter by the Pennsylvania Bar Association's Committee on Legal Ethics and Professional Responsibility;
- (4) Carpenters Health may petition for additional legal fees or costs in association with the collection and enforcement of this matter.

Berg has served as Deputy Attorney General of Pennsylvania and has been active within the Democrat Party in his state. His website reports that he has performed a great deal of work pro bono, is a member of the ACLU and NRA, and is active in his local fire police squadron. He has filed lawsuits against former President George W. Bush and putative president Barack Obama, claiming that Obama "was born in Mombasa, Kenya; was adopted/acknowledged in Indonesia where Obama's 'legal' name became and is 'Barry Soetoro' as there is no evidence that Obama ever 'legally' changed his name from his adopted name of 'Barry Soetoro.'"

Contrary to Berg's claim that The Post & Email "failed to conduct any type of verification" of what Taitz told us, we reviewed PDF documents from Taitz's website before publication. The documents are also available through public court records systems. Judge Robreno's report of a December 20, 2010 hearing in the United States District Court for the Eastern District of Pennsylvania states that Liberi admitted to being a convicted felon (page 8). It asserts that Liberi "was often combative and evasive, and much of her testimony was argument without factual basis."

Taitz describes Liberi as a "convicted document forger and thief" (pp. 3-4). Berg's case against Taitz, entitled *Liberi, et al v. Taitz, et al.*, can be found [here](#).

The Post & Email also reviewed a letter with Berg's signature on it which acknowledged that his employee, Lisa Liberi, was a convicted felon.



Page 2 of a letter signed by Philip J. Berg to Judge Robreno stating that Lisa Liberi is a convicted felon

The pertinent text found in paragraph 3 reads:

It is true that Plaintiff Liberi has been convicted of a felony, in one case, not multiple cases, however, Mrs. Liberi has worked extremely hard putting her life back together...

There is also a conviction report posted on Taitz's website which she sent to us in PDF format bearing Liberi's name and those of apparent aliases.

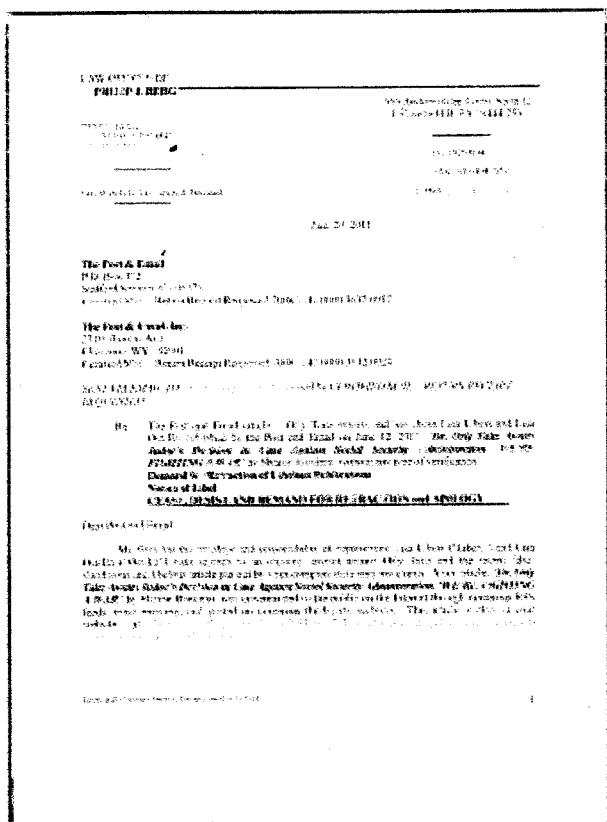
Case #UW000000-Subcase# 100012-10701-00A-B - Charges					
Actual Charges					
Date Entered	Description	Charge Type	Amount	Unit	Reason
10/24/00	CHARGE 1	CHARGE	1000.00	1000.00	
Billed Charges					
Date Entered	Description	Charge Type	Amount	Unit	Reason
10/24/00	CHARGE 1	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 2	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 3	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 4	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 5	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 6	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 7	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 8	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 9	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 10	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 11	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 12	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 13	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 14	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 15	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 16	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 17	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 18	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 19	CHARGE	1000.00	1000.00	
10/24/00	CHARGE 20	CHARGE	1000.00	1000.00	
Total Charges					
Date Entered	Description	Charge Type	Amount	Unit	Reason
10/24/00	CHARGE 1	CHARGE	1000.00	1000.00	

**First page of 87-page criminal history document on  
a Lisa R. Liberi and several aliases**

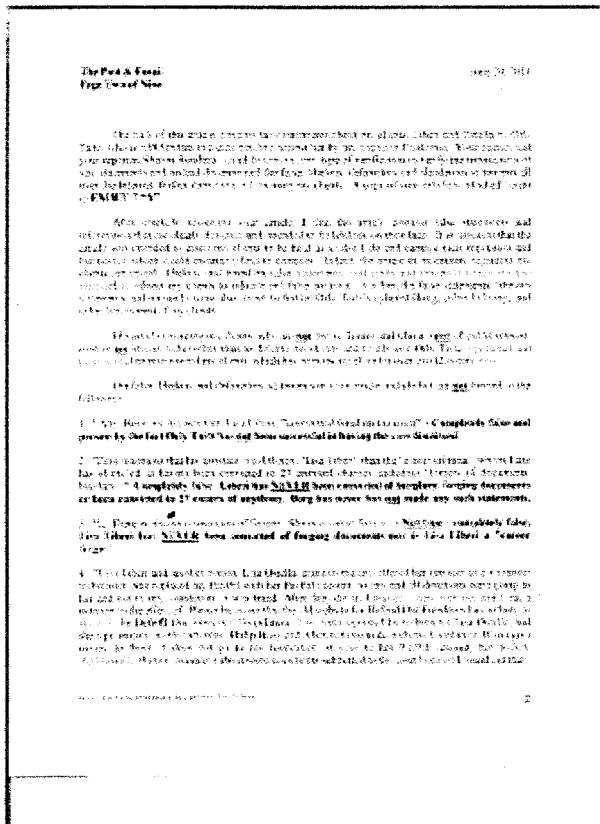
**Page 2 of the 87-page criminal report on Lisa R.  
Liberi and aliases**

In a different matter, a Petition for Discipline signed by two members of the Pennsylvania Disciplinary Board related an incident wherein a case initiated by Berg on behalf of a client, Ms. McCracken, had been dismissed without Berg having informed the client of such. The summary states that Lisa Liberi had promised Ms. McCracken that Berg would respond to her queries about the outcome of her case, but that "the Respondent" (Berg) promised to look into it and call her back but he never did" (page 5). That Petition for Discipline against Berg is active at this time with the Disciplinary Board of the Supreme Court of Pennsylvania.

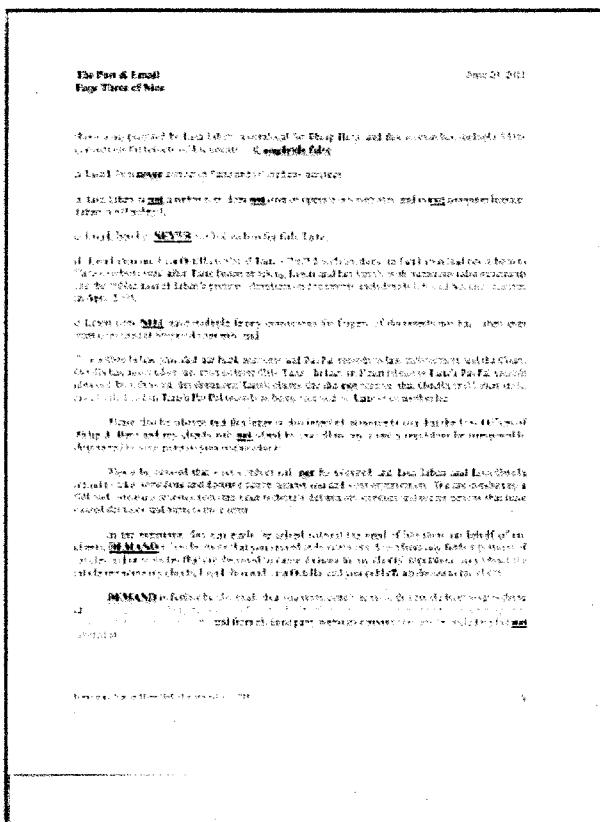
The first letter Berg sent to The Post & Email was completely unexpected and consisted of nine pages:

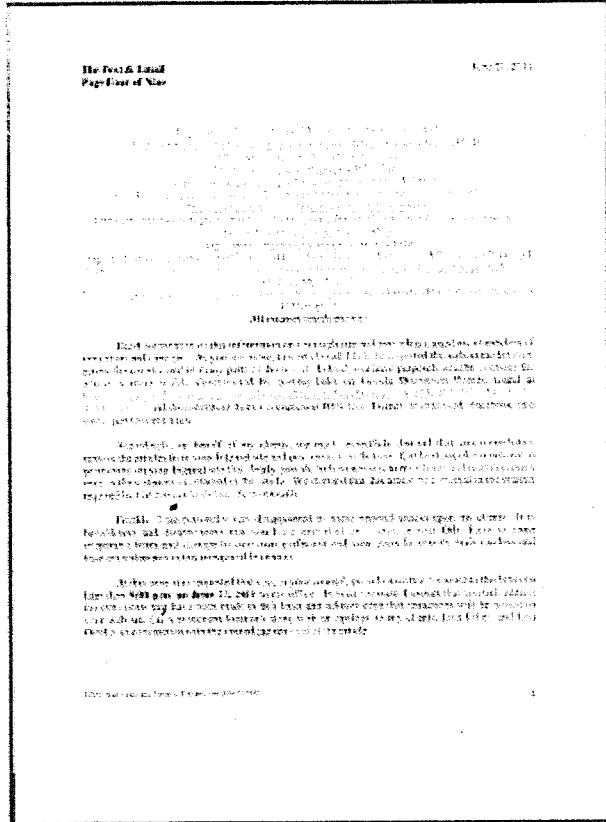


**Page 1 of "CEASE, DESIST AND DEMAND FOR RETRACTION AND APOLOGY" letter from Atty. Philip J. Berg**



Page 2 of Berg's letter





Page 4

**Page 4 above states, in part:**

The dissemination of this information on your web site and article has caused my clients loss of reputation and damages. As you are aware, this article will likely be re-posted throughout the Internet, across the country and in many parts of the world. Indeed, you have purposely sought to ensure the article is more widely disseminated by posting links on Google Discussion Boards, found at...and disseminating them via numerous RSS feeds [sic]; Twitter; friends feed; Facebook; and email, just to name a few.

Berg's claim is completely false. The Post & Email does not have the time nor the inclination to post links to its articles anywhere. Because The Post & Email has proven to be a source of reliable hard news, many sites and discussion boards post our links for purposes of dissemination, but we neither promote this activity nor take part in it. We cannot control what other people do, although we appreciate proper attribution for our work. Our purpose is to research, write and report the news in a factual and responsible manner, not damage people's reputations.

The next paragraph on page 4 states:

Accordingly, on behalf of my clients, we must respectfully demand that you immediately remove the articles from your Internet site and post retractions that are of, at least, equal prominence in positioning on your Internet site that clearly provide both an apology to my clients and unambiguously retracts the statements contained in the article. We demand that this article be corrected in the manner required by *California Civil Code, Section 48a(3)*.

Prior to that statement, Berg referred to one article. Then he referred to multiple articles but reverted back to identifying one article.

The Post & Email is incorporated in Wyoming; therefore, it is unknown why Berg mentions California Civil Code.

The First & Second  
Proprietary Note

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**What is the role of the state in education? Is it to provide and regulate, or is it to leave it to the market? Is it to develop a range of educational models, or is it to impose a single model? These are some of the questions that have been raised by the debate on education reform.**

These are the names of the members of the Board of Education appointed by the Mayor of New York City, and the names of the trustees appointed by the Board of Education. The Board of Education consists of nine members, and the trustees consist of three members each.

#### REFERENCES AND NOTES

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B. 1933.  
H. B. Longfellow

Philip J. Morris

635

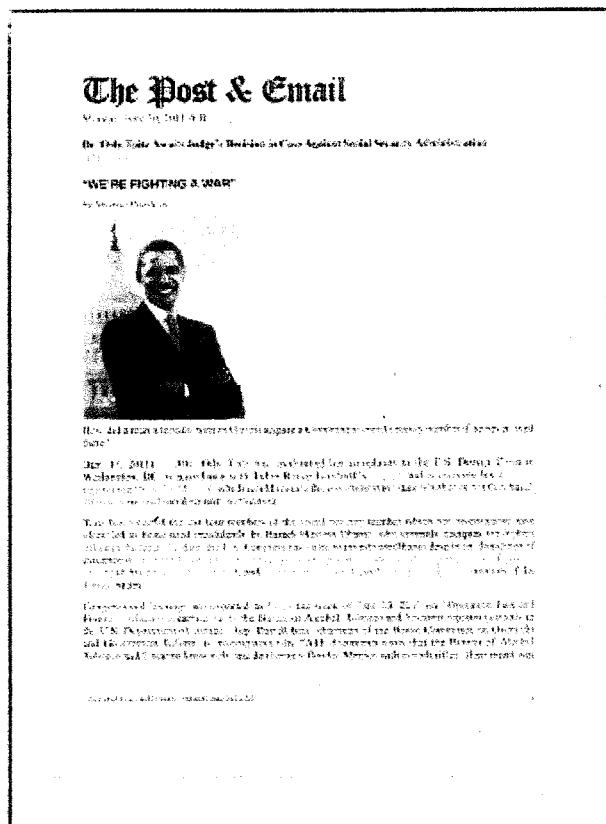
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Page 5

**Pages 6-9 of Berg's letter are a reproduction of the our June 13, 2011 article:**

**EXHIBIT "A"**

Page 6 of Berg's letter containing only the heading  
"Exhibit A"



Page 7 of Berg's letter which is the first page of the article in which Taitz discussed her social security lawsuit and the Liberi and Ostella lawsuits filed by Berg

Deze gedachte moet worden verdragen. Daarop gebaseert een deel van de voorstellingen die we nu gaan behandelen.

The following information can be used to calculate the number of hours required to complete the project, assuming a constant rate of work.

**Urgent action required** – A new approach needs to be taken to tackle the problem of food waste.

P20190000000000000000

4. The Health Board would like to be the focus of the Human Resources Department of Health, working closely with the personnel director, Michael and Gillian Webster. They stated that the Health Board Management believe that they are committed to the values from Integrity, Honesty and transparent accountability.

**Border incidents reported** (as known by their location). - For Small Inland Waterways, the following border incidents have been reported during 1943:

### REFERENCES

John Jacob Astor, the New York merchant and banker, Mr. Philip Dorn, editor and author, Mrs. Elizabeth Cady Stanton, and many others of the time understand. Moreover that Mr. Dorn and Mr. Astor have been, I believe, beaten in the election. Mr. Dorn and Mr. Astor have been beaten because their names were not on the ballot paper. The reason is that the State has not yet passed a law requiring that all names be put on the ballot paper.

In 1948, the U.S. Congress passed the Taft-Hartley Act, which prohibited secondary strikes and gave employers the right to fire strikers. This legislation was a major victory for business and a setback for labor. The act also established the National Labor Relations Board (NLRB) to oversee union elections and collective bargaining.

How has human civilization changed since the end of 2008? What does this tell you about the world, and for your and your clients' needs, how can we best be a financial consultant? Please add a comment or two if you have time.

One I am not certain about. The Republic agreed to it and offered her an opportunity to withdraw. She refused to withdraw from the Second World War, which will illustrate how she was not so good as the rest. After the July 1st, 1946, attack on Korea, she did not withdraw. She remained there, fighting, until the Korean War ended in 1953.

## Page 8, a continuation of The Post & Email's June 13 article

Highly-qualified people, drivers, Milagro Buses and other vehicles in the city can be obtained. If you plan to go to Morelos, I suggest you take Toluquilla. It is the best place to go. According to Morelos, the bus from Toluquilla to Cuernavaca takes approximately 1½ hours and the fare is approximately 20 pesos. I think that Pachuca-Durango is about 4 hours and costs 40 pesos.

How did it seem to you that the singer was a different man later, but he was not the last I saw who had lost his innocence and his youth? What a contrast! And listen again to "Home Sweet Home." As the voices sing, "Remember us at last green days," there's that same sense of loss, of regret, of longing. Much worse, however, is the singer. Signify him to the audience, as he does to himself, as a lost soul, a lost boy, a lost man.

Called a Movie to see—indeed, for the first time ever—by Mrs. Alice A. Amundson, president of the local women's club. She, like so many others, has been a "No" voter. I happen to understand that she is one of the few who have voted "Yes" in the election. We are at the moment, Mrs. Amundson and I, in the rear of the room, surrounded by others. Alice, being so young, is still a member of the Young People's League. This organization and all of the other organizations, except the League, which we have to Harry, is trying to rouse us from apathy concerning

<sup>1</sup> The author is grateful to Professors J. N. Duggan, Brian G. Linsley, Koenraad Dewulf, and Dr. Iain D. R. Macleod, and to two anonymous referees for their useful comments on earlier versions of this paper. This research was funded by grants from the Research Foundation-Flanders (FWO-Vlaanderen) and the University of Antwerp (UAntwerp).

Table 1. Summary of various atmospheric photochemical models used for the determination of steady-state concentrations of  $\text{O}_3$  and  $\text{NO}_2$ , and relevant background concentrations of  $\text{NO}_x$  at different locations worldwide. Numerical values will be given for the U.S. and Europe, except specific cases. Primary sources of information are the more recent literature on the subject of steady-state  $\text{O}_3$  formation. Major uncertainties in the atmospheric models under consideration are due to the lack of knowledge

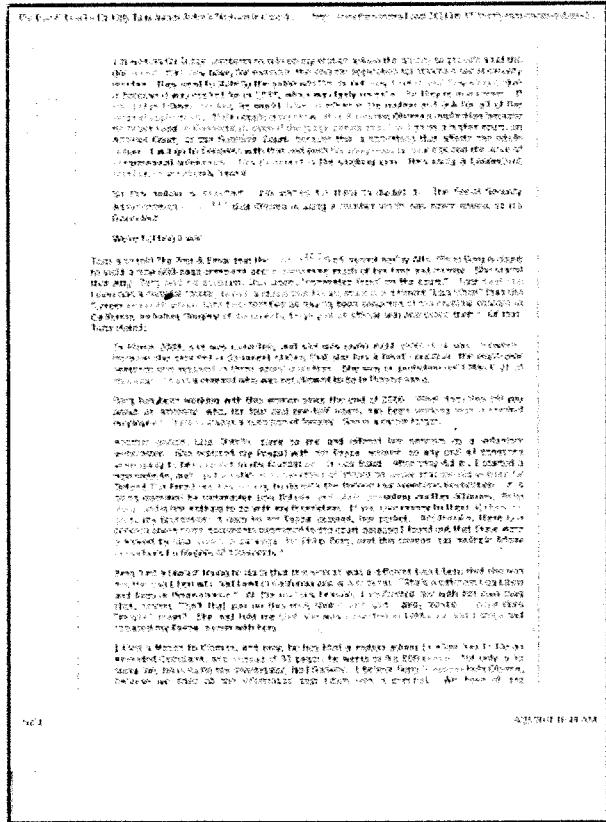
Figure 10 shows that the difference between the two models is largest at the lowest frequencies and smallest at the highest frequencies. The two models are identical at 1000 Hz.

Fig. 11. The  $\text{C}_2\text{H}_2$  absorption bands observed in the plasma excited. Termal  
reactions and secondary reactions can be observed in the absorption spectra.

Long distance calls were free.

Page 9 of Berg's letter, which is the last page of our article

When Berg or his assistant reproduced the article, apparently the “printer-friendly” function was not utilized, as the information directly quoted from Taitz was not indented as is our practice. Those indentations appear both in the printer-friendly online published versions. Below is page 2 of the printer-friendly version:



Page 2 of printer-friendly version which retains the indentations used by The Post & Email to show that someone is being quoted

Berg's reproduction of the article contains a left-aligned margin throughout and could give the impression that information provided by Taitz was our own writing when it was not.

After receiving the letter on the evening of June 20, 2011, this writer responded to Berg by calling the phone number shown on page 1 of his letter. He answered but said he was tied up with another long-distance call. He stated that he would return our call shortly and did so shortly before 10:00 p.m. EDT. When we asked, "How are you?" he responded, "I'm trying to get the usurper out of office." He then told us that Lisa Liberi was on another line to participate in the phone call. We asked Berg if we could record the call, and both he and Liberi gave their permission for us to do so. Berg appeared affable and relaxed.

It was stated on the tape that the call was not to be published. The Post & Email kept its word and neither published the audio recording nor a transcription of same.

However, we did contact Atty. Orly Taitz regarding the statement Berg had made on page 5 of his letter in which he said:

Otherwise, it is our suggestion that you contact your legal counsel as soon as possible since we believe that there is ample cause to file numerous claims against you and your operations. This can easily be done by replacing "DOE" Defendants with your paper, The Post and [sic] Email; Reporter and Editor of the article,

Sharon Rondeau; and John Charlton, as Editor Emeritus & Founder into the current lawsuit against Orly Taitz, *Liberi et al v. Taitz, et al*, Case No. 8:11-cv-00485 AG in the U.S. District Court, Central District of California, Southern Division before the Honorable Judge Andrew J. Guilford.

[Editor's Note: It should be noted that John Charlton has been gone for over a year and is not listed as an officer or director of the company; therefore, it is unknown why Berg has included his name. Charlton retained no financial interest in The Post & Email whatsoever when he departed.]

Because The Post & Email has no business in California other than readers who reside there, we contacted Taitz about a potential attorney-client relationship should Berg follow through on his threat to include us as a defendant in his lawsuit against Taitz. We also asked if there were any inaccuracies in the article, and, in fact, Taitz pointed out that there were. Those were corrected that same evening accompanied by an editor's note at the bottom. We asked Taitz if there was any chance that there were two "Lisa Liberis" which were perhaps mixed up. During the phone call, we had asked if there were two people with her name, and neither Berg nor Liberi responded.

As a responsible journalist, it was incumbent upon this writer to ascertain whether or not the article was factual. The recording of Taitz for the June 13 article had been of unusually poor quality, which we didn't know until after the interview had finished. We are grateful that Taitz pointed out some minor errors which did not change the focus of the story but were nevertheless important. Our conversation with her was not intended for publication; we did not ask Taitz to publish nor disseminate any of it; nor did The Post & Email publish Berg's letter.

Orly Taitz published two paragraphs about what had transpired on her website the following morning which then went on to detail her own case with Berg.

Toward the end of the phone conversation, Berg provided us with his cell phone number and asked us to call him after consulting with our counsel, which we did. The following day, Tuesday, June 21, this writer contacted Berg on his cell phone, and we had a brief but cordial conversation. At this point the story must be told in first person to reflect complete accuracy and context. The call was not recorded, so the language used is approximate; however, this writer took notes as we were speaking.

Upon the advice of counsel, I asked Berg if he actually intended to sue The Post & Email, and he immediately answered, "No, no. We're looking for a retraction." I then said, "Before I published the article, I reviewed court documents from a hearing between Taitz and you from December 20, 2010, and the documents indicated that Liberi is, in fact, a convicted felon. If you can send me documentation that my story was inaccurate, I will be happy to post a retraction or correction." I explained to Berg that I always obtain documentation to support the information provided by an interviewee and gave him an example of a specific story on which I have not reported because documentation has been very difficult to obtain. Berg stated that he was familiar with that particular story.

Berg then asked me, "What documents were you looking at?" and I listed them specifically. He asked me to send them to him, which I said I would do. I then said, "Please send me any documentation you have which refutes the accuracy of the documents from Orly's site," and Berg replied, "Well, send me the documents and we'll do the best we can."

Before ending the call, I said to Berg, "I must tell you that my father is dying in a nursing home, and the deadline of 5:00 p.m. on June 23, 2011 you have given me to provide a written response might not be possible." Berg quickly asked, "What's wrong with him?" and I briefly explained the long illness he has had in violation of his living will upon the decision of certain family members. (The group of readers receiving our weekly "Editor's Note" is aware of this, as are other close friends.) I offered to give Berg my father's name and the nursing home where he is staying, but Berg declined, saying, "No, no. Don't worry about the deadline. We'll work with you on that."

Following the phone conversation with Berg, The Post & Email followed through on its promise and sent Berg the following email:

**From:** Sharon Rondeau  
**Sent:** Tue 6/21/11 4:41 PM  
**To:** Phil Berg (philjberg@gmail.com)  
**Subj:** DOCUMENTS ATTACHED PER OUR PHONE CALL

Thank you for speaking with me today, Atty. Berg.

Here is the updated story with the changes which Orly Taitz stated needed to be made and a correction noted:

<http://www.thepostemail.com/2011/06/12/dr-orly-taitz-awaits-judges-decision-in-case-against-social-security-administration/>

I have also attached the documents which I reviewed before publishing the article on June 13, 2011. A letter signed by you dated December 22, 2010 states that Liberi was convicted of one felony. The second document entitled "Memorandum" with Judge Eduardo Robreno's name at the top left contains a transcript of the court proceedings from December 20, 2010 which provided background information. The last document, which I believe is actually the first attachment, is an 87-page conviction record for a "Lisa R. Liberi." If there is documentation proving that this is the wrong Lisa Liberi, please send it to me and I will take appropriate action.

I am also extending another invitation for you, Lisa Liberi and Lisa Ostella to do a telephonic interview to refute Taitz's claims to be published at The Post & Email along with all documentation which you have.

Thank you for understanding the situation with my dad. He is a World War II veteran and deserved, and wanted, much better than this.

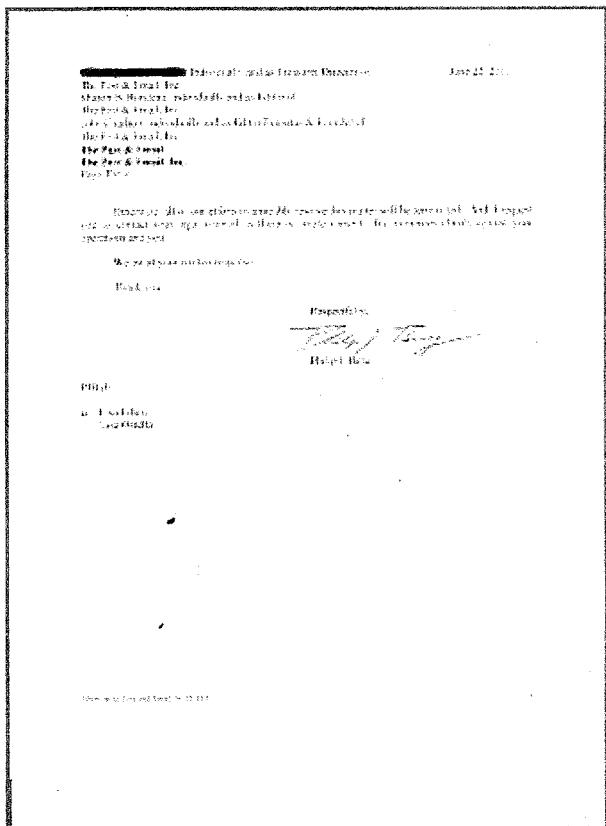
Sharon Rondeau  
Editor  
The Post & Email, Inc.  
[www.thepostemail.com](http://www.thepostemail.com)  
[editor@thepostemail.com](mailto:editor@thepostemail.com)

The Post & Email never received any documentation from Berg at all, so "the best we can" ended up yielding nothing to refute Taitz's claims, the court documentation, and The Post & Email's article of June 13, 2011.

However, on the evening of June 22, 2011, The Post & Email received a second threatening letter.

Page 1 of second letter from Atty. Philip J. Berg

## **Page 2 of Berg's second letter to The Post & Email**



**Page 3 of Berg's second "Cease and Desist" Letter**

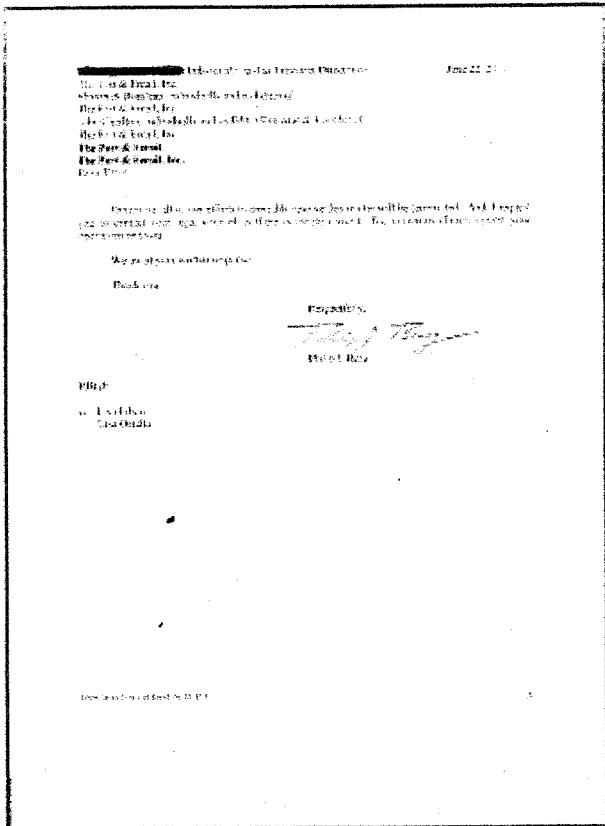
The first paragraph of page 2 reads:

Unfortunately, it is apparent that you and the Post and [sic] Email are assisting Orly Taitz with her continued cyber-stalking; cyber-harassment; cyber-bullying; harassment; distribution of her false statements regarding my clients; and you are a bully pulpit for Orly Taitz.

To further substantiate the Post and [sic] Email's improper intent and yours, you immediately communicated with Orly Taitz our discussion regarding the first "Cease and Desist" and "Demand for Retraction" letter sent to you, as she (Orly Taitz), as an Attorney and an Officer of the Court, placed aspects of our call on her website, her Facebook pages, her "Before its news" pages and sent it through numerous RSS feeds to thousands of locations, on your Corporation's and your behalf.

The Post & Email never asked Taitz to post anything "on our behalf." We never asked her to post anything at all regarding this matter; therefore, Berg's assertion is false. As noted above, we were consulting her regarding a potential client-attorney relationship.

Farther down on page 2, Berg repeats his demand for a written response to his letter "no later than 5:00 p.m. on June 24, 2011 to my office." He disregarded the imminent death of this writer's father and imposed another inordinately short time frame for a response in any event.



#### Last page of second letter from Berg

The letter is identifying the principals of The Post & Email as individuals as well as corporate officers. However, as a corporation, the persons involved are protected from "individual" liability. That was one of the purposes of establishing The Post & Email as a C-Corporation. The company has its own bank account and its CPA files its own tax return. One attorney we consulted even stated that if Berg pursued the personal property of either of the principals, it would "likely be illegal."

On June 24, 2011, this writer contacted Berg again on his cell phone. He stated, "I'm not happy with you, frankly. You went right to her – that tape was not for publication and you went right to her and she put it out there. You did us wrong. I need to hear from you or your attorney in writing. Goodbye," and he hung up. Again, this is an approximation, as the call was not recorded.

The Post & Email will be publishing the actions it has taken against Berg himself is notified of them. The Post & Email stands by its June 13, 2011 article as corrected until such time as documentation is provided to prove that our assertions and those of Orly Taitz were wrong. We reported on a lawsuit which was already public knowledge, which fact Berg affirmed himself by referring to the case number "8:11-cv-00485 AG" in his letter to us and contained the names "Lisa Liberi" and "Lisa Ostella."

**Editorial Note:** Recently, a reader communicated to us that he has given "thousands of dollars" to Berg for the purpose of disclosing Obama's records and background. Where did those "thousands" go? How much money has Berg collected? Are the funds being used to harass small media outlets such as The Post & Email which obtain and publish the truth, as opposed to the Big Media companies which are nothing but corporately-controlled mouthpieces for the government and have failed to seriously report on the Obama eligibility question, thereby defrauding the public?

Would Berg be doing this if we were MSNBC or CNN?

The Post & Email is a small company with few assets except our intellectual property, but we will survive this unwarranted attack on our credibility and integrity. If the American people want truth in media rather than

"spin," we will continue to grow. We will fight any and all false claims made against us and admit it if we are wrong. We will not be manipulated nor intimidated.

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## The Post & Email

IF YOU LIKED THIS REPORT, CLICK HERE TO DONATE \$1,  
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- » [Inconsistencies found in passport applications released by State Department for Obama's alleged mother](#)
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The Post & Email  
Page Five of Nine

June 20, 2011

While we do not believe that a retraction or removal of the article will completely restore the harm that has been performed upon my clients, it certainly would serve to mitigate damages and be the *right thing to do*. Hopefully, you will understand and appreciate this request.

Otherwise, it is our suggestion that you contact your legal counsel as soon as possible since we believe that there is ample cause to file numerous claims against you and your operations. This can easily be done by replacing "DOE" Defendants with your paper, The Post and Email; Reporter and Editor of the article, Sharon Rondeau; and John Charlton, as Editor Emeritus & Founder into the current lawsuit against Orly Taitz, *Liberti, et al v. Taitz, et al.* Case No. 8:11-cv-00485 AG in the U.S. District Court, Central District of California, Southern Division before the Honorable Judge Andrew J. Guilford.

We await your written response.

Thank you.

Respectfully,

Philip J. Berg

PJB:jb

Enclosure

The Post & Email  
Page Five of Nine

June 20, 2011

While we do not believe that a retraction or removal of the article will completely restore the harm that has been performed upon my clients, it certainly would serve to mitigate damages and be the *right thing to do*. Hopefully, you will understand and appreciate this request.

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We await your written response.

Thank you.

Respectfully,

Philip J. Berg

PJB:jb

Enclosure

LAW OFFICES OF  
**PHILIP J. BERG**

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PHILIP J. BERG  
CATHERINE R. BARONE  
BARBARA MAY

555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531

---

(610) 825-3134

FAX (610) 834-7659

NORMAN B. BERG, Paralegal [Deceased]

E-Mail: [philjberg@gmail.com](mailto:philjberg@gmail.com)

June 20, 2011

**The Post & Email**

P.O. Box 302  
Stafford Springs, CT 06076  
Certified Mail – Return Receipt Requested 7008 1140 0000 3632 0917

**The Post & Email, Inc.**

2710 Thomas Ave.  
Cheyenne, WY 82001  
Certified Mail – Return Receipt Requested 7008 1140 0000 3632 0924

*SENT VIA EMAIL TO [editor@thepostemail.com](mailto:editor@thepostemail.com) and by CERTIFIED MAIL – RETURN RECEIPT REQUESTED*

Re: The Post and Email article: Orly Taitz smears and lies about Lisa Liberi and Lisa Ostella published by the Post and Email on June 12, 2011, "***Dr. Orly Taitz Awaits Judge's Decision in Case Against Social Security Administration 'WE'RE FIGHTING A WAR***" by Sharon Rondeau, without any type of verification  
**Demand for Retraction of Libelous Publications**  
**Notice of Libel**  
**CEASE, DESIST AND DEMAND FOR RETRACTION and APOLOGY**

Dear Post and Email:

My firm has the privilege and responsibility of representing Lisa Liberi ("Liberi") and Lisa Ostella ("Ostella") with regards to an ongoing lawsuit against Orly Taitz and the recent false, slanderous and libelous article put out by your company defaming my clients. Your article, "***Dr. Orly Taitz Awaits Judge's Decision in Case Against Social Security Administration, 'WE'RE FIGHTING A WAR***" by Sharon Rondeau, was disseminated to the public on the Internet through numerous RSS feeds; mass emailing; and posted on numerous third-party websites. This article is also on your website at <http://www.thepostemail.com/2011/06/12/dr-orly-taitz-awaits-judges-decision-in-case-against-social-security-administration/>.

**The Post & Email**  
**Page Two of Nine**

June 20, 2011

The bulk of this article contains false statements about my clients, Liberi and Ostella by Orly Taitz, who is a Defendant in a case pending against her by my clients in California. Your agency and your reporter, Sharon Rondeau, failed to conduct any type of verification to verify the truthfulness of said statements and instead disseminated the false, libelous, defamatory and slanderous statements all over the Internet, further damaging and harming my clients. A copy of your article is attached hereto as **EXHIBIT "A"**.

After carefully reviewing your article, I find the article contains false statements and information that are clearly designed and intended to be libelous on their face. It is apparent that the article was intended to cause my clients to be held in a false light and damage their reputation and businesses, which would invariably lead to damages. Indeed, the article in its entirety regarding my clients are grossly libelous and based on false statements, half-truths and innuendo which are also intended to subject my clients to ridicule and false portrayal. Further, the false statements, libelous statements and innuendo were also meant to further Orly Taitz's cyber-stalking; cyber-bullying; and cyber-harassment of my clients.

The article regarding my clients, who are not public figures and who are not of public interest, contain no literary value other than to defame my clients and to advance Orly Taitz's personal and professional animus toward my clients, which has been taking place for over two (2) years now.

The false, libelous and defamatory statements in your article include but are not limited to the following:

1. "Atty. Berg and his assistant, Lisa Liberi, "committed fraud on the court" - **Completely false and proven by the fact Orly Taitz has not been successful in having the case dismissed.**
2. "Berg maintains that his assistant is a different "Lisa Liberi" than the "career criminal" whom Taitz has identified as having been convicted of 27 criminal charges, including "forgery of documents, burglary..." **Completely false. Liberi has NEVER been convicted of burglary, forging documents or been convicted in 27 counts of anything. Berg has never has not made any such statements.**
3. "... There is always a suspicion of forgery. She is a career forger." - **Not true - completely false, Lisa Liberi has NEVER been convicted of forging documents nor is Lisa Liberi a "career forger".**
4. "Lisa Liberi and another person, Lisa Ostella, came to me and offered her services as a volunteer webmaster. She replaced my PayPal with her PayPal account, so any and all donations were going to her and not to my foundation. It was fraud. After they did it, I started a new website, and I put a notation to the effect of "Please be aware that the old website for Defend Our Freedoms has nothing to do with the Defend Our Freedoms Foundation. It is being operated by webmaster Lisa Ostella, and she's promoting another attorney, Philip Berg, and it has nothing to do with my foundation. If you give money to them, it does not go to my foundation; it goes to her PayPal account, her pocket. Additionally, there is a concern about some documents submitted to the court because I found out that

**The Post & Email**  
**Page Three of Nine**

June 20, 2011

those were prepared by Lisa Liberi, a paralegal for Philip Berg, and this woman has multiple felony convictions for forgery of documents." **Completely false.**

- a. Lisa Liberi **never** contacted Taitz and offered any services,
- b. Lisa Liberi is **not** a webmaster, does **not** own or operate any websites; and is **not** computer literate. Liberi is a Paralegal;
- c. Lisa Liberi has **NEVER** worked with or for Orly Taitz;
- d. Lisa Liberi nor Lisa Ostella replaced Taitz's PayPal with anything, in fact Liberi had never been to Taitz's website until after Taitz began attacking Liberi and her family with numerous false statements and the publication of Liberi's primary identification documents, including full Social Security number, in April 2009;
- e. Liberi does **NOT** have multiple felony convictions for forgery of documents nor has Liberi ever been convicted of forging documents; and
- f. Lisa Ostella has provided her bank accounts and PayPal records to law enforcement and the Court, Ostella has never taken any monies from Orly Taitz. In fact, in Court filings is Taitz's PayPal records obtained by subpoena, the donations Taitz's claims she did **not** receive, that Ostella and Liberi stole, are clearly listed in Taitz's PayPal records as being received by Taitz - yes another lie.

Please also be advised that this letter is also intended as notice to you that the Law Offices of Philip J. Berg and my clients will **not** stand by and allow my client's reputation be irresponsibly disparaged by your paper or your organizations.

Please be advised that your conduct will **not** be tolerated and Lisa Liberi and Lisa Ostella intend to take immediate and decisive action against you and your organization. We are conducting a full and extensive investigation into your website's defamatory conduct and recent actions that have caused damages and harm to my clients.

In the meantime, this can easily be solved without the need of litigation, on behalf of my clients, **DEMAND** is hereby made that you immediately cease and desist from any further postings of articles and/or websites that are designed to cause damage to my clients' reputation; you retract the article regarding my clients, Lisa Liberi and Lisa Ostella; and you publicly apologize to my clients.

**DEMAND** is further hereby made that you immediately remove this article from your website at <http://www.thepostemail.com/2011/06/12/dr-orly-taitz-awaits-judges-decision-in-case-against-social-security-administration/>; and from all third party websites carrying this article, including but **not** limited to: